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District of Nevada

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Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ABEL FRIAS,
Plaintiff,
v.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,
Defendant.

Civil No. 2:15-cv-01348-JCM-VCF

DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm and Response to Plaintiff's Motion for Reversal, due on **November 10, 2015**, by **30 days**, through and including **December 10, 2015**.

An extension of time is needed because counsel for Defendant is currently responsible for numerous district court cases at various stages of litigation. Counsel for Defendant is also currently responsible for conducting discovery and preparing substantive motions in personnel-related

1 litigation matters pending before the Equal Employment Opportunity Commission and Central
2 District Court of California.

3 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
4 motion, on November 6, 2015.

5 Respectfully submitted this 6th day of November 2015.

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7 DANIEL G. BOGDEN
United States Attorney

8 /s/ Sundeep Patel
9 SUNDEEP PATEL
10 Special Assistant United States Attorney

11
12 OF COUNSEL:

13 DEBORAH LEE STACHEL
14 Acting Regional Chief Counsel, Region IX

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17 IT IS SO ORDERED:

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19 _____

20 UNITED STATES MAGISTRATE JUDGE

21 DATED: November 6, 2015
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CERTIFICATE OF SERVICE

I, **Sundeep Patel**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

LEONARD H. STONE, ESQ. No. 5791
NICOLE K. STEINHAUS, ESQ. No. 11722
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Attorneys for Plaintiff, ABEL FRIAS

Dated this 6th day of November 2015

//s// Sundeep Patel
SUNDEEP PATEL
Special Assistant United States Attorney